

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
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**MOTION TO EXCLUDE GENERAL-CAUSATION TESTIMONY OF  
DIONYSIOS K. VERONIKIS, M.D.**

In accordance with the extension of time agreed to by the parties, Defendants Ethicon, Inc. and Johnson & Johnson (Ethicon) move to exclude certain general-causation testimony of Dionysios K. Veronikis, M.D. Portions of Dr. Veronikis's proposed opinion testimony are unreliable and irrelevant under the standard set forth in *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), and as expressed by this Court in prior rulings. Ethicon incorporates its Memorandum in Support of Motion to Exclude General-Causation Testimony of Dionysios K. Veronikis, M.D., and also the following exhibits:

1. The list of cases to which this motion applies, identified by case style and number, attached as Exhibit A;
2. Letter dated April 28, 2016, which represents the agreement of counsel to extend the filing date of this motion to May 23, 2016, attached as Exhibit B;
3. Rule 26 Expert Report of Dr. Dionysios K. Veronikis regarding TVT, attached as Exhibit C;

4. Rule 26 Expert Report of Dr. Dionysios K. Veronikis regarding Gynemesh PS (and Prolene Soft Mesh), attached as Exhibit D; and
5. Deposition of Dionysios K. Veronikis, M.D., taken April 30, 2016, attached as Exhibit E.

WHEREFORE, FOR THESE REASONS and as more fully set forth in Ethicon's supporting memorandum of law, Ethicon respectfully requests that this Court enter an order granting Ethicon's Motion to Exclude the General-Causation Testimony of Dionysios K. Veronikis, M.D.

Respectfully submitted,

ETHICON, INC. AND  
JOHNSON & JOHNSON

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**CERTIFICATE OF SERVICE**

I certify that on May 23, 2016, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

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